

Exhibit A



Erin McVicar <erin@karpf-law.com>

Starting Discovery in Christian v. Omnis

Christine Burke <cburke@karpf-law.com>

Thu, Feb 6, 2025 at 10:10 AM

To: "Norwillo, Haley" <HNorwillo@littler.com>

Cc: "Hank, Matthew" <MHank@littler.com>, Erin McVicar <erin@karpf-law.com>, "Myers, Donald W." <DWMyers@littler.com>, "Laborda Nelson, Alexa" <ALabordaNelson@littler.com>

Morning Matt & Haley -

Thank you for speaking with me this morning.

As discussed, given the currently pending Motions to Dismiss (Defense: on the FCA claim, and Pl.: on the counter claim), the Parties agree to engage in discovery for those claims which are not subject to a Motion to Dismiss.

We will serve R. 26 disclosures on or before 2/13 and written discovery in the interim. While I don't believe the JDP we jointly crafted is presently due to the Court (until a Rule 16 notice is issued), I understand you will revise the plan to align with today's discussions and represent to me for ultimate submission.

Please let me know if you have any questions.

Christine

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